



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to
Implement the Commission's
Procurement Incentive Framework and
to Examine the Integration of
Greenhouse Gas Emissions Standards
into Procurement Policies.

R.06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES
ON THE INTERIM OPINION ON GREENHOUSE
GAS REGULATORY STRATEGIES**

DIANA L. LEE

Attorney for the Division of
Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-4342
Fax: (415) 703-4432
Email: dil@cpuc.ca.gov

PAUL S. PHILLIPS

Regulatory Analyst for the Division of
Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2039
Email: psp@cpuc.ca.gov

CHRISTINE S. TAM

Regulatory Analyst for the Division of
Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 355-5556
Email: tam@cpuc.ca.gov

BETH MOORE

Regulatory Analyst for the Division of
Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-1784
Email: blm@cpuc.ca.gov

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I. INTRODUCTION

The Division of Ratepayer Advocates (DRA) submits these reply comments on the Proposed “Interim Opinion on Greenhouse Gas Regulatory Strategies” (PD), pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure.

II. DISCUSSION

DRA’s reply comments focus on three issues: (1) the PD’s recommendation regarding an increased RPS; (2) parties’ suggestion for a separate sector for CHP; and (3) a prioritization of the remaining issues to be resolved before the ARB Scoping Plan is completed.

**A. The Joint Commissions Should Refrain from Recommending that
ARB Pursue a Legislative Mandate To Increase the RPS Until
Feasibility is Determined.**

Parties disagree on the PD’s recommendation that the ARB seek legislation to mandate renewable procurement beyond the 20% RPS requirement. Some parties have asserted that an increase in the mandated RPS might not be necessary, and could result in unnecessary cost increases to ratepayers. Sempra Global asserts that the Joint Commissions should “focus on developing a robust cap-and-trade program with the proper incentives and rules, and let the market find the right amount of additional renewables.”¹ DRA agrees, and reiterates that the Joint Commissions should seek the least cost path to compliance with Assembly Bill (AB) 32 vis a vis the combination of existing policy programs and a cap-and-trade system. Furthermore, although DRA supports the other RPS program

¹ Comments of Sempra Global on Proposed Decision, February 28, 2008 (Sempra Global Comments), at 3.

goals and benefits beyond GHG emissions reductions, the Joint Commissions should remain flexible in how GHG compliance obligations are met beyond the current policy mandates.

The Green Power Institute (GPI) states that “there is no good reason for the Commission to step back from the EAP’s adopted long-term renewables goal at this point in time,” noting that “unless or until the legislature codifies the 33 percent by 2020 goal into statute it remains just a goal, not a mandate.”² GPI notes that the PD relies on the Energy Action Plan II (EAP II) and its recommended loading order, and asserts that compliance with AB 32 “only strengthens the imperative for adopting an aggressive stretch goal for the RPS program.”³ Similarly, CEERT expresses concern that the PD “turns back” from the 2008 Energy Action Plan Update (2008 EAP Update) pledge to remain “dedicated to working towards the 33% RPS goal.”⁴ However, the 2008 EAP Update explains “we are committed to working together to evaluate the potential for making 33 percent of the power delivered in California renewable by 2020.”⁵ The 2008 EAP Update does not set a firm 33% RPS target for 2020. Thus, the PD does not fall short of any existing mandate, nor does it renege on a promise by proposing a recommendation to ARB.

Nevertheless, while DRA supports exploring the feasibility of a 33% renewables target, DRA reiterates that it is premature to urge ARB to seek legislation to mandate this target for the purposes of meeting the objectives of AB 32. DRA recognizes that the RPS program is designed to meet goals other than those mandated by AB 32. However, the Joint Commission should resist the temptation to “put the cart before the horse” by increasing the renewables target in attempt to meet the emissions reductions goal mandated by AB32. As acknowledged in the 2008 EAP Update, there remain significant transmission siting, permitting, and cost constraints that impede California’s progress toward its 2010 RPS goal as well as the 33% currently explored by the Joint Commissions.⁶

CEERT contends that the support of the Governor, the Climate Action Team, and recommended legislation for the 33% RPS target implies that the PD *must* incorporate this standard.⁷

² Comments of the Green Power Institute on the Proposed Decision of President Peevey, February 28, 2008 (GPI Comments), at 2.

³ *Id.*

⁴ Comments of The Center for Energy Efficiency and Renewable Technologies on the Proposed Decision of President Peevey, February 28, 2008 (CEERT Comments), at 5.

⁵ 2008 Energy Action Plan Update, February 2008 (2008 EAP Update) at 12 (emphasis added).

⁶ *Id.* at 13. These issues have also caught the attention of the legislature and were the subject of the Senate Energy, Utilities and Communications Committee's RPS Informational Hearing on February 26, 2008. Lack of transmission is the most prominent barrier to achieving “stretch” RPS goals and there is insufficient support to overcome significant local opposition to additional transmission lines..

⁷ CEERT Comments, at 3.

However, the PD is not required to recommend that ARB seek legislation to mandate this goal, and the 33% RPS target is not official policy, but rather simply a potential objective that is being evaluated for feasibility.

DRA also believes that the new Long-Term Procurement Proceeding⁸ is the more appropriate forum for exploring this issue. It may turn out that after the necessary programmatic changes, research and development advancements, and the removal of other obstacles, an aggressive 33% RPS goal would be attainable under the AB 32 timeline. Until this target is deemed feasible, DRA seeks to avoid the potentially detrimental cumulative rate impacts of unnecessarily aggressive program mandates.

B. DRA supports the creation of a separate CHP sector as proposed by EPUC/CAC.

In their opening comments, Energy Producers and Users Coalition (EPUC) and the Cogeneration Association of California (CAC) asserted that the PD's proposed regulatory framework for the electricity and natural gas sector will create an unintentional disadvantage for Combined Heat and Power (CHP) operation and investment, despite the fact that CHP installations provide significant energy efficiency improvements in industrial applications by capturing unused waste heat for process heating or cooling. EPUC/CAC gave an example to illustrate how an industrial customer would increase its direct GHG responsibility by operating CHP on-site and thereby incur a greater cost responsibility for GHG compliance.² Furthermore, the proposed regulatory framework creates a confusing and complex regulatory scheme for CHP resources, with the potential that a single CHP facility be subjected to GHG regulations across multiple sectors.¹⁰ EPUC/CAC requested that the Commission modify the PD to recognize the emission reduction potential of CHP resources and recommend that the ARB create a separate CHP sector.

The potential of CHP facilities to reduce GHG emissions has been endorsed by the Economic and Technology Advancement Advisory Committee (ETAAC) and AB 1613 (signed into law in October 2007.) In particular, Section 2980.6(c) of the Public Utilities Code states that “[i]t is the intent of the Legislature to support and facilitate both customer- and utility-owned combined heat and power systems.” DRA agrees with EPUC/CAC, that the PD's proposed regulatory scheme will likely

⁸ R.08-02-007.

² EPUC/CAC opening comments, p. 11

¹⁰ EPUC/CAC pointed out that (i) large CHP facilities will be regulated as an industrial point source for on-site electricity use and thermal, and as a first seller for electricity sold to grid; (ii) small CHP facilities will be regulated as part of the natural gas sector for on-site electricity use and thermal use, and as a first seller for electricity sold to grid. EPUC/CAC opening comments, p. 13.

discourage deployment of CHP installations by creating multiple GHG regulatory requirements and associated reporting burden for CHP facility owners. The creation of a separate CHP sector, at least for now, will focus policy makers' attention on potential GHG emission reductions and the impact of CHP facilities on the electricity sector. In particular, priority areas to address include the development of qualifying criteria for CHP facilities¹¹ and the projection of GHG emissions reductions attributed to qualified CHP systems.¹²

DRA recommends that the Joint Commission solicit further input from parties to determine whether or not to include the separate CHP sector under the proposed statewide cap-and-trade system. The subsequent determination made by the Joint Commissions can be memorialized in a Commissioner's ruling as a recommendation to the ARB in its developments of the Scoping Plan.¹³

C. Given the number and magnitude of issues, the Commission should focus on those that must be resolved in time to include in the ARB scoping memo.

Pacific Gas and Electric Company (PG&E's) Opening Comments point out the number of "significant regulatory design issues" that remain for resolution in this proceeding, including actual emissions limits and reduction goals applicable to the electric and gas sectors; apportionment of GHG emissions reduction responsibility between the electric and gas sector and other sectors and categories of sources; methods for allocating GHG emissions allowances among different sources in the electric sector; cost mitigation strategies to protect consumers; and the results of economic modeling and analyses to determine the most cost effective and technologically feasible emissions reduction strategies.¹⁴ DRA agrees that substantial work remains for the Joint Commissions in order to provide timely guidance to the ARB. Recommendations to ARB on many of the issues, including annual sector emissions caps, projected emissions reductions from renewables, energy efficiency, CHP and other potential emission reduction measures as determined by the E3 modeling effort, and appropriate flexible compliance mechanisms, should be provided in time for inclusion in ARB's Draft Scoping Plan that is expected to be released this coming June. Given the number and complexity of these

¹¹ Section 2843 of the Public Utilities Code states that "the Energy Commission shall, by January 1, 2010, adopt guidelines that combined heat and power systems subject to this chapter shall meet [...]"

¹² Section 2845 of the Public Utilities Code states that "the State Air Resources Board shall report to the Governor and the Legislature by December 31, 2011, on the reduction in emissions of greenhouse gases resulting from the increase of new electrical generation that utilizes excess waste heat through combined heat and power systems [...]."

¹³ The Scoping Plan is required Section 2843 of the Public Utilities Code states that "the Energy Commission shall, by January 1, 2010, adopt guidelines that combined heat and power systems subject to this chapter shall meet [...]"

¹⁴ Opening Comments of PG&E on Proposed Decision on GHG Regulatory Strategies, p. 2

issues, it is likely that some of the other remaining issues, including the development of and entity specific allocation of allowances and the entity-specific caps,¹⁵ may need to be deferred until after issuance of the ARB Draft Scoping Plan. DRA recommends that the Commission evaluate the remaining areas for which recommendations must be provided to ARB by June, and focus the attention of parties on the highest priority issues.

III. CONCLUSION

For the foregoing reasons, the CPUC and CEC should modify their recommendations to the ARB regarding GHG regulatory strategies.

Respectfully submitted,

/s/ DIANA L. LEE

Diana L. Lee
Attorney for Division of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-4342
Fax: (415) 703-4432

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¹⁵DRA recommends that the Joint Commissions provide additional clarification that developing recommendations for entity specific caps is part of this proceeding. While the issue is briefly mentioned in the December 21, 2007 “Assigned Commissioner Ruling Modifying the Phase 2 Scoping Memo and Updating the Phase 2 Schedule,” it is not discussed in detail, resulting in confusion. For example, comments of the Southern California Public Power Authority (SCPPA) state that “Under the PD, there would be no individual caps on participants in the cap-and-trade program.” (SCPPA Opening Comments, p. 12.) While the PD does not establish entity specific caps, the December 21 Scoping Memo implies that they will be developed later in this proceeding.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES** ” in **R.06-04-009** by using the following service:

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Executed on March 4, 2008 at San Francisco, California.

/s/ ALBERT HILL

Albert Hill

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SERVICE LIST

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dhecht@sempratrading.com	svongdeuane@semprasolutions.com	kerry.hattevik@mirant.com
cadams@covantaenergy.com	troberts@sempra.com	kowalewskia@calpine.com
steven.schleimer@barclayscapital.com	ctiddell@energyattorney.com	hoerner@redefiningprogress.org
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kyle_boudreaux@fpl.com	llund@commerceenergy.com	bmcc@mccarthyllaw.com
cswoollums@midamerican.com	thunt@cecmall.org	sberlin@mccarthyllaw.com
Cynthia.A.Fonner@constellation.com	mdjoseph@adamsbroadwell.com	Mike@alpinenaturalgas.com
kevin.boudreaux@calpine.com	jeanne.sole@sfgov.org	joyw@mid.org
trdill@westernhubs.com	john.hughes@sce.com	bdicapo@caiso.com
ej_wright@oxy.com	llorenz@semprautilities.com	UHelman@caiso.com
todil@mckennalong.com	marcel@turn.org	wamer@kirkwood.com
steve.koerner@el Paso.com	nsuetake@turn.org	mary.lynch@constellation.com
jenine.schenk@apses.com	dil@cpuc.ca.gov	lrdevanna-rf@cleanenergysystems.com
jbw@slwplc.com	fjs@cpuc.ca.gov	abb@eslawfirm.com
kelly.barr@srpnet.com	achang@nrdc.org	mclaughlin@braunlegal.com
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Lorraine.Paskett@ladwp.com	mpa@a-klaw.com	glw@eslawfirm.com
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snewsom@semprautilities.com	bill.chen@constellation.com	
dhuard@manatt.com	epoole@adplaw.com	westgas@aol.com
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dehling@kling.com	bcragg@goodinmacbride.com	atowbridge@daycartermurphy.com
gregory.koiser@constellation.com	jsqueri@gmssr.com	dansvec@hdo.net
npedersen@hanmor.com	jarmstrong@goodinmacbride.com	notice@psrec.coop
mmazur@3phasesRenewables.com	kbowen@winston.com	cynthia.schultz@pacificorp.com
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tiffany.rau@bp.com	mday@goodinmacbride.com	ryan.flynn@pacificorp.com
klatt@energyattorney.com	sbeatty@cwclaw.com	carter@ieta.org
rhelgeson@scppa.org	vprabhakaran@goodinmacbride.com	jason.dubchak@niskags.com
douglass@energyattorney.com	jkarp@winston.com	bjones@mjb Bradley.com
pssed@adelphia.net	edwardoneill@dwt.com	
bwallerstein@aqmd.gov	jeffgray@dwt.com	kcolburn@symbioticstrategies.com
akbar.jazayeri@sce.com	cjw5@pge.com	rapcowart@aol.com
cathy.karlstad@sce.com	ssmyers@att.net	Kathryn.Wig@nrgenergy.com
Laura.Genao@sce.com	lars@resource-solutions.org	sasteriadis@apx.com
rkmoore@gswater.com	alho@pge.com	george.hopley@barcap.com
dwood8@cox.net	bkc7@pge.com	ez@pointcarbon.com
atrial@sempra.com	aweller@sel.com	burtraw@rff.org
apak@sempraglobal.com	jchamberlin@strategicenergy.com	vb@pointcarbon.com
daking@sempra.com	beth@beth411.com	andrew.bradford@constellation.com

gbarch@knowledgeinenergy.com	aimee.barnes@ecosecurities.com	jwiedman@goodinmacbride.com
ralph.dennis@constellation.com	case.admin@sce.com	jkarp@winston.com
smindel@knowledgeinenergy.com	Jairam.gopal@sce.com	koconnor@winston.com
brabe@umich.edu	tim.hemig@nrgenergy.com	mmattes@nossaman.com
bpotts@foley.com	bjl@bry.com	bwetstone@hotmail.com
james.keating@bp.com	aldyn.hoekstra@paceglobal.com	jen@cnt.org
jimross@r-c-s-inc.com	ygross@sempraglobal.com	lisa_weinzimer@platts.com
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tcarlson@reliant.com	scottanders@sandiego.edu	ELL5@pge.com
ghinners@reliant.com	jkloberdanz@semprautilities.com	GXL2@pge.com
zaiontj@bp.com	andrew.mcallister@energycenter.org	jxa2@pge.com
julie.martin@bp.com	jennifer.porter@energycenter.org	JDF1@PGE.COM
fiji.george@el Paso.com	sephra.ninow@energycenter.org	RHHJ@pge.com
echiang@elementmarkets.com	dniehaus@semprautilities.com	sscb@pge.com
fstern@summitblue.com	jleslie@luce.com	SEHC@pge.com
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nlenssen@energy-insights.com	ekgrubaugh@iid.com	S1L7@pge.com
bbaker@summitblue.com		vjw3@pge.com
william.tomlinson@el Paso.com	mona@landsiteinc.net	karla.dailey@cityofpaloalto.org
kjsimonsen@ems-ca.com	pepper@cleanpowermarkets.com	farrokh.albuyeh@oati.net
jholtkamp@hollandhart.com	gsmith@adamsbroadwell.com	dtibbs@aes4u.com
Sandra.ely@state.nm.us	Diane_Fellman@fpl.com	ralf1241a@cs.com
bmcquown@reliant.com	hayley@turn.org	jhahn@covantaenergy.com
dbrooks@nevp.com	mflorio@turn.org	andy.vanhorn@vhcenergy.com
anita.hart@swgas.com	Dan.adler@calcef.org	Joe.paul@dynegey.com
randy.sable@swgas.com	mhyams@sfwater.org	info@calseia.org
bill.schrand@swgas.com	tburke@sfwater.org	gblue@enxco.com
jj.prucnal@swgas.com	norman.furuta@navy.mil	sbeserra@sbcglobal.net
sandra.carolina@swgas.com	amber@ethree.com	monica.schwebs@bingham.com
ckmitchell1@sbcglobal.net	annabelle.malins@fco.gov.uk	phanschén@mofo.com
chilen@sppc.com	dwang@nrdc.org	wbooth@booth-law.com
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dsoyars@sppc.com	nes@a-klaw.com	pthompson@summitblue.com
tdillard@sppc.com	obystrom@cera.com	dietrichlaw2@earthlink.net
jgreco@terra-genpower.com	sdhilton@stoel.com	alex.kang@itron.com
leilani.johnson@ladwp.com	scarter@nrdc.org	Betty.Seto@kema.com
randy.howard@ladwp.com	abonds@thelen.com	JerryL@abag.ca.gov
Robert.Rozanski@ladwp.com	brbc@pge.com	jody_london_consulting@earthlink.net
robert.pettinato@ladwp.com	cbaskette@enernoc.com	steve@schiller.com
HYao@SempraUtilities.com	colin.petheram@att.com	mrw@mrwassoc.com
rprince@semprautilities.com	jwmctarnaghan@duanemorris.com	rschmidt@bartlewells.com
rkeen@manatt.com	kfox@wsgr.com	adamb@greenlining.org
nwhang@manatt.com	kkhoja@thelenreid.com	stevek@kromer.com
pjazayeri@stroock.com	pvalen@thelen.com	clyde.murley@comcast.net
derek@climaterestry.org	ray.welch@navigantconsulting.com	brenda.lemay@horizonwind.com
david@nemtzw.com	spauker@wsgr.com	nrader@calwea.org
harveyederpspc.org@hotmail.com	jwmctarnaghan@duanemorris.com	carla.peterman@gmail.com
sendo@ci.pasadena.ca.us	rreinhard@mofo.com	elvine@lbl.gov
slins@ci.glendale.ca.us	cem@newsdata.com	rhwisner@lbl.gov
THAMILTON5@CHARTER.NET	arno@recurrentenergy.com	C_Marnay@lbl.gov
bjeider@ci.burbank.ca.us	hgolub@nixonpeabody.com	philm@scdenergy.com
rmorillo@ci.burbank.ca.us	jscancarelli@flk.com	rita@ritanortonconsulting.com

cpechman@powereconomics.com
emahlon@ecoact.org
richards@mid.org
rogerv@mid.org
tomk@mid.org
fwmonier@tid.org
brbarkovich@earthlink.net
johnrredding@earthlink.net
clark.bernier@rlw.com
rmccann@umich.edu
cmkehrein@ems-ca.com
grosenblum@caiso.com
mgillette@enernoc.com
rsmutny-jones@caiso.com
saeed.farrokhpay@ferc.gov
e-recipient@caiso.com
david@branchcomb.com
kenneth.swain@navigantconsulting.com
kdusel@navigantconsulting.com
gpickering@navigantconsulting.com
lpark@navigantconsulting.com
davidreynolds@ncpa.com
scott.tomashefsky@ncpa.com
ewolfe@resero.com
Audra.Hartmann@Dynergy.com
Bob.lucas@calobby.com
curt.barry@iwpnews.com
danskopecc@gmail.com
dseperas@calpine.com
dave@ppallc.com
dkk@eslawfirm.com
wynne@braunlegal.com
kgough@calpine.com
kellie.smith@sen.ca.gov
kdw@woodruff-expert-services.com
mwaugh@arb.ca.gov
pbarthol@energy.state.ca.us
pstoner@lgc.org
rachel@ceert.org
bernardo@braunlegal.com
steven@lipmanconsulting.com
steven@iepa.com
wtasat@arb.ca.gov
lmh@eslawfirm.com
etiedemann@kmtg.com
ltenhope@energy.state.ca.us
bushinskyj@pewclimate.org
obartho@smud.org
bbeebe@smud.org
bpurewal@water.ca.gov
dmacmull@water.ca.gov
kmills@cbbf.com
karen@klindh.com

ehadley@reupower.com
sas@a-klaw.com
egw@a-klaw.com
akelly@climatetrust.org
alan.comnes@nrgenergy.com
kyle.silon@ecosecurities.com
californiadockets@pacificorp.com
Philip.H.Carver@state.or.us
samuel.r.sadler@state.or.us
lisa.c.schwartz@state.or.us
cbreidenich@yahoo.com
dws@r-c-s-inc.com
jesus.arredondo@nrgenergy.com
charlie.blair@delta-ee.com
Tom.Elgie@powerex.com
clarence.binninger@doj.ca.gov
david.zonana@doj.ca.gov
myk@cpuc.ca.gov
agc@cpuc.ca.gov
aeg@cpuc.ca.gov
blm@cpuc.ca.gov
bbc@cpuc.ca.gov
cf1@cpuc.ca.gov
cft@cpuc.ca.gov
tam@cpuc.ca.gov
dsh@cpuc.ca.gov
edm@cpuc.ca.gov
eks@cpuc.ca.gov
cpe@cpuc.ca.gov
hym@cpuc.ca.gov
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jnm@cpuc.ca.gov
jbf@cpuc.ca.gov
jk1@cpuc.ca.gov
jst@cpuc.ca.gov
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jol@cpuc.ca.gov
jci@cpuc.ca.gov
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litt@cpuc.ca.gov
mjd@cpuc.ca.gov
ner@cpuc.ca.gov
pw1@cpuc.ca.gov
psp@cpuc.ca.gov
pzs@cpuc.ca.gov
rmm@cpuc.ca.gov
ram@cpuc.ca.gov
smk@cpuc.ca.gov
sgm@cpuc.ca.gov
svn@cpuc.ca.gov
scr@cpuc.ca.gov

tcx@cpuc.ca.gov
zac@cpuc.ca.gov
ken.alex@doj.ca.gov
ken.alex@doj.ca.gov
jsanders@caiso.com
jgill@caiso.com
ppettingill@caiso.com
mscheibl@arb.ca.gov
gcollord@arb.ca.gov
jdoll@arb.ca.gov
pburmich@arb.ca.gov
bblevins@energy.state.ca.us
dmetz@energy.state.ca.us
deborah.slone@doj.ca.gov
dks@cpuc.ca.gov
kgriffin@energy.state.ca.us
ldecarlo@energy.state.ca.us
mprior@energy.state.ca.us
mgarcia@arb.ca.gov
pduvair@energy.state.ca.us
wsm@cpuc.ca.gov
ntronaas@energy.state.ca.us
hurlock@water.ca.gov
hcronin@water.ca.gov
rmiller@energy.state.ca.us